



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JPL
F. #2014R01920

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 6, 2020

By ECF and Hand

The Honorable Dora L. Irizarry
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Daniel Rendon-Herrera
Criminal Docket No. 14-625 (S-3) (DLI)

Dear Chief Judge Irizarry:

The government respectfully writes to request that the Court order that the time between January 10, 2020 and January 16, 2020 be excluded from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

Earlier today, the Court rescheduled the upcoming status conference in this case from January 10, 2020 at 11:00 a.m. to January 16, 2020 at 3:30 p.m. However, the current order of excludable delay is set to expire on January 10, 2020. Accordingly, in light of the recent adjournment and because the parties continue to engage in plea negotiations, the government respectfully requests that the Court order that the intervening time be excluded from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

Finally, I have spoken with defense counsel about this matter, who consents to this request.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Jonathan P. Lax
Assistant U.S. Attorney
(718) 254-6139

cc: Johanna Zapp, Esq. (counsel to defendant) (by ECF)